

LAW OFFICES OF  
**JEFFREY LICHTMAN**  
11 EAST 44<sup>TH</sup> STREET  
SUITE 501  
NEW YORK, NEW YORK 10017  
www.jeffreylichtman.com

JEFFREY LICHTMAN  
JEFFREY EINHORN  
DAVID GELFAND

PH: (212) 581-1001  
FX: (212) 581-4999

April 21, 2022

**BY ECF**

Hon. Laura Taylor Swain  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: United States v. Constantinescu, et al., 19 CR 651 (LTS)**

Dear Judge Swain:

I am writing on behalf of defendant Theofrastos Lymberatos to respectfully request a modification of the defendant's conditions of release which would permit him to have his location monitoring bracelet removed on April 27, 2022 in advance of his surrender to FCI Loretto the following day. According to Pretrial Services, Mr. Lymberatos' location monitoring bracelet could not be removed by them on the day of his surrender due to the distance to the prison, and if the device is removed by the Bureau of Prisons, it is unlikely to be returned to the Southern District. Pretrial Services consents to this request, and the government, by AUSA Robert Sobelman, defers to this position.

Thank you for the Court's consideration of this application. I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: All counsel (by ECF)  
Pretrial Services (by email)

The foregoing request is granted. Dkt. no. 1057 resolved.  
SO ORDERED.

4/25/2022

/s/ Laura Taylor Swain, Chief USDJ